

# EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S IDENTIFICATION OF CLAIM TERMS  
REQUIRING CONSTRUCTION**


Pursuant to Section H, paragraph 1 of the Pretrial Schedule A of the Scheduling Order in this matter, ePlus identifies the following terms from the asserted claims which it contends require construction by the Court.

1.     **Electronic sourcing system** (Claims 1, 3 and 6 of the '683 Patent; Claims 1, 2, 5, 6, 9, 10, 17, 21, 22 and 29 of the '516 Patent; Claims 1 and 5 of the '172 Patent).
2.     **Means for selecting the product catalogs to search** (Claims 1 and 3 of the '683 Patent).
3.     **Means for searching for matching items among the selected product catalogs** (Claims 1 and 3 of the '683 Patent).
4.     **Means for building a requisition using data relating to selected matching items and their associated source(s)** (Claims 1, 3, and 6 of the '683 Patent).
5.     **Means for processing the requisition to generate one or more purchase orders for the selected matching items** (Claims 1, 3 and 6 of the '683 Patent).

6. **Means for determining whether a selected matching item is available in inventory** (Claim 1 of the '683 Patent; Claim 5 of the '172 Patent).
7. **Means for converting data relating to a selected matching item and an associated source to data relating to an item and a different source** (Claims 3 and 6 of the '683 Patent).
8. **Means for searching for matching items in the database** (Claim 6 of the '683 Patent).
9. **Means for entering product information that at least partially describes at least one desired item** (Claim 1 of the '172 Patent).
10. **Means for searching for matching items that match the entered product information in the selected portions of the database** (Claim 1 of the '172 Patent).
11. **Means for generating an order list that includes at least one matching item selected by said means for searching** (Claim 1 of the '172 Patent).
12. **Means for building a requisition that uses data obtained from said database relating to selected matching items on said order list** (Claim 1 of the '172 Patent).
13. **Means for processing said requisition to generate purchase orders for said selected matching items** (Claim 1 of the '172 Patent).

Respectfully submitted,

Date: December 15, 2009



Craig T. Merritt (VSB #20281)

Henry I. Willett, III (VSB #44655)

**CHRISTIAN & BARTON, L.L.P.**

909 East Main Street, Suite 1200

Richmond, VA 23219

Telephone: (804) 697-4100

Facsimile: (804) 697-4112

[cmerritt@cblaw.com](mailto:cmerritt@cblaw.com)

[hwillett@cblaw.com](mailto:hwillett@cblaw.com)

Jennifer A. Albert (*admitted pro hac vice*)

Scott L. Robertson (*admitted pro hac vice*)

David M. Young (VSB #35997)

**GOODWIN PROCTER LLP**

901 New York Avenue, N.W.

Washington, DC 20001

Telephone: (202) 346-4000

Facsimile: (202) 346-4444

[jalbert@goodwinprocter.com](mailto:jalbert@goodwinprocter.com)

[srobertson@goodwinprocter.com](mailto:srobertson@goodwinprocter.com)

[dyoung@goodwinprocter.com](mailto:dyoung@goodwinprocter.com)

Lana S. Shiferman (*admitted pro hac vice*)

James D. Clements (*admitted pro hac vice*)

**GOODWIN PROCTER LLP**

Exchange Place

53 State Street

Boston, MA 02109-2881

Telephone: (617) 570-1000

Facsimile: (617) 523-1231

[lshiferman@goodwinprocter.com](mailto:lshiferman@goodwinprocter.com)

[jclements@goodwinprocter.com](mailto:jclements@goodwinprocter.com)

Attorneys for Plaintiff, ePlus inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of December, 2009, I will serve Plaintiff's  
Identification of Claim Terms Requiring Construction on the following counsel of record as  
indicated:

*via electronic mail:*

Daniel W. McDonald  
Merchant & Gould P.C.  
3200 IDS Center  
80 South 8<sup>th</sup> Street  
Minneapolis, MN 55402-2215  
[dmcDonald@merchantgould.com](mailto:dmcDonald@merchantgould.com)

Robert A. Angle (VSB# 37691)  
Dabney J. Carr, IV (VSB #28679)  
Troutman Sanders LLP  
P.O. Box 1122  
Richmond, VA 23218-1122  
Telephone: (804) 697-1238  
Facsimile: (804) 698-5119  
[robert.angle@troutmansanders.com](mailto:robert.angle@troutmansanders.com)  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)

***Counsel for Defendant Lawson Software, Inc.***

  
\_\_\_\_\_